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11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 James Anthony Davis,

14 Plaintiff,

15 v.

16 Michael Minev, *et al.*,

17 Defendants.

Case No. 2:22-cv-01796-RFB-DJA

**Stipulation for Revised Scheduling  
Order**

19  
20 Pursuant to FRCP 16(b)(4) and Local Rule 26-2, the parties stipulate and agree  
21 to modify/extend the Scheduling Order (ECF No. 33) and respectfully request the  
22 Court approve the proposed schedule, set forth herein. This is the first stipulation for  
23 the extension of these deadlines. This request is submitted at least twenty-one (21)  
24 days or more before the close of discovery (July 18, 2024) is made in good faith, and  
25 is supported by good cause.  
26

**STATEMENT OF FACTS IN SUPPORT OF STIPULATION**

On April 5, 2024, most of the Defendants answered Mr. Davis's complaint (ECF 32). On April 22, this Court entered a scheduling order contemplating a 90 day period for discovery to be completed, with an end date of July 18, 2024. ECF 33.

Counsel for the parties have since conferred, and agree that more time is necessary to complete discovery. Additional time is needed because this is a case involving complex medical issues, with multiple claims concerning different issue, voluminous medical records, and which will likely involve experts. Accordingly the parties would propose the following schedule be adopted, running from May 3, 2024.

- The parties may engage in a discovery for a period of 180 days, ending on October 30, 2024;
- Any and all pleadings that may be brought under Fed. R. Civ. P. 13 and 14, or joining additional parties under Fed. R. Civ. P. 19 and 20, must be filed within 60 days, which is July 2, 2024. Any party causing additional parties to be joined or brought into this action must contemporaneously serve a copy of this Order on the new party or parties.
- Amendments to pleadings as provided for under Fed. R. Civ. P. 15, if they are allowed without leave of Court, or motions for leave to amend, must comply with LR 15-1 and must be filed and served within 90 days from the date of this order, which is August 1, 2024.
- Expert disclosures must be made on or before August 30, 2024, and disclosures of rebuttal experts must be made on or before September 30, 2024.
- Dispositive Motions: that they be filed and served no later than November 29, 2024;

- Joint Pretrial Order: that it be due on December 30, 2024. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

### CONCLUSION

Based on the foregoing and for good cause appearing, the Parties respectfully request that the Court approve their Stipulation and alter the discovery deadlines as set forth above.

Dated May 7, 2024

Aaron D. Ford  
Attorney General

/s/ Jessica Brown

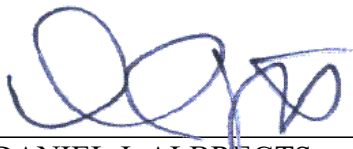
Jessica Brown  
Deputy Attorney General

Rene L. Valladares  
Federal Public Defender

/s/ Ryan Norwood

Ryan Norwood  
Assistant Federal Public Defender

IT IS SO ORDERED:

  
\_\_\_\_\_  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: 5/8/2024